

central office space. There is no organized method for understanding the internal space demands so this part of the process can take anywhere from weeks to months to conclude.

18. Once this coordination has concluded, BA confirms with the requesting collocator that it wants to go ahead with collocation. BA then processes an estimate of cost, gets necessary funding from the construction budget to finance the collocation arrangement, and obtains internal authorization to make the necessary expenditures to build the collocation arrangement. Obtaining a cost estimate approval can take up to five weeks.
19. BA's Common Systems group then requests the Real Estate Organization to issue work orders to purchase the cage, prepare floor space, and install air-conditioning, among other things. Simultaneously, an order is issued in the Vendor Engineering Center and Field Engineering to install the BA network that will support collocation, i.e. installing the POT bay, service access cables, and DC power. The Vendor Engineering Center purchases the necessary equipment and provides detailed engineering services. The field engineers establish a final implementation schedule. This could take another five weeks.
20. At last, BA informs the CLEC that a cage is ready. The interval in BA-North is 76 business days and the process I've talked about may bring the timeline well beyond the interval. This is why BA usually tries to talk the CLEC into delaying or staggering the cage deliveries because it simply does not have the wherewithal to meet the interval.

21. Further, it isn't surprising that BA refuses to allow CLEC to chart the progress of their collocation arrangement. I don't think even BA knows the status of collocations because there is no overall management of its collocation process.
22. Also, BA-NY treats the turnover to Covad as a type of "first inspection" of the collocation cage to determine its worthiness to support telecommunications service. Not one of the 28 cages that Covad has received to date met our requirements. I'll explain these problems later.

COVAD'S COLLOCATION EXPERIENCE

23. To date, Covad's collocation experience in New York has been extremely frustrating. Today Covad has 28 cages in New York. None of these cages was ready to support Covad's service on the turn-over date. Not one of these 28 cages has been brought into compliance with Covad's requirements. It has been extremely time-consuming to identify and correct these many deficiencies on a cage-by-cage basis, the result being a significant delay in actual turn-over of these cages. BA's field engineers were not aware of Covad's requirements nor did they know BA's own collocation requirements. Attached to my affidavit as Attachment A is a list of the deficiencies found in some of our cages. I'll note that Covad has made a total of over 73 applications for physical collocation, including the 28 cages we now have.
24. As I mentioned, not one of our 28 cages was delivered per Covad's requirements. When cage inspection occurs, Covad uses a form called "Covad Collocation Cage Acceptance Checklist" to determine whether a collocation has been properly constructed. The checklist identifies requirements regarding the cage, common area, power (AC, DC), lighting, POT bay, cabling, and other issues. In the case of Covad's

28 cages, the following list identifies some but not all of the problems which were encountered:

- Cage: cage door had to be moved to gain access to the cage, wrong-sized cage, upgrade of cage needed, wrong ironwork, wrong placement of cage, top of cage caved in
- Common area: no stumble lighting, no lock on common area door, no common area key, building lighting switch not available, no access card
- Air conditioning not installed
- Cabling: no cabling in POT bay, wrong cabling in cage, cable hole flange placed upside down, cables not supported, cables not butted, cable not long enough to reach fuse on Covad panel
- Power: no outlets or insufficient number of outlets, breakers and outlets not labeled/stenciled, wrong size essential feeds
- POT Bay: installed in reverse, insufficient or incorrect racking
- Grounding: ground bar out of limits, ground bar not bonded to cage
- Lighting: no emergency lighting, no access to light switch in common area and access hallway
- Other issues: new floor required due to asbestos removal, no environmental alarms, garbage in halls, excessive dust and debris left in space due to construction, water pipes by cage, window by radiator not sealed

25. Again, BA has yet to remedy many of the problems with our collocation cages. As far as we're concerned, BA has yet to turnover the vast majority of Covad's 28 cages for which we placed orders on May 1, 1998.

26. Up until the present, there has not been any process in place to ensure that a cage complies with the specific requirements of a CLEC. There has been no quality inspection. We've just recently been informed that BA will do a quality inspection on the cages, no doubt in response to Covad's complaints on its 28 cages.

When I was at BA, it was my job to troubleshoot on collocation problems on space issues, equipment deployment, or anything else that came up. I did some quality work and came up with space workarounds where supposedly no space existed. Basically, I was the last resort for problem collocation applications. It's my understanding that my position wasn't replaced. I don't understand why there aren't any resources dedicated to this important function. The quality of Covad's cages received to date certainly demonstrates the need for additional resources.

AVAILABILITY OF SPACE

27. I have concerns about space availability in BA central offices. Our first couple rounds of collocation applications revealed that there are space limitations in New York that affect Covad's ability to get into key central offices that serve many potential customers. There are 5 no space offices of the 63 initial applications. I have yet to know whether there will be space limitations in the remaining applications we have made. BA hasn't yet responded to these.

28. My knowledge of the central offices in New York makes me very concerned about BA-NY's ability to accommodate the remainder of Covad's applications. I seriously question whether BA is capable of assuring that it is efficiently using central office space. And I do not believe that there is a system in place to track current use of space and to fairly allocate available space between BA and CLEC use.

I believe that the space problem is caused in large part because there is fierce competition within BA for space in the central offices. Various groups within BA fight to retain and obtain space for their future use. I think it's fair to say that CLEC space is relegated to whatever space hasn't been earmarked for internal use. Prioritization is really just between CLECs and CLECs don't have a voice in this fight for space. BA's policy does not permit CLEC walk-throughs in central offices that supposedly do not have space for collocation. Inspections might be allowed on an individual basis. In New York, Covad hasn't been allowed to inspect a premise that is no space. The end result is that CLECs are being shut out of central offices.

OTHER ISSUES

29. We have also received very high costs for conditioning space in certain central offices. We are still waiting for cost details from BA.
30. Covad has not been receiving timely price quotes. For our second and third batches of applications, BA has been delinquent in getting Covad price quotes. This affects 42 of our applications.
31. Furthermore, for applications made in early July, there are turnover dates that go well beyond the interval. BA can do no better than provision some of these requests by mid February of next year, over seven months after we applied for these spaces. In most cases, we don't even have turnover dates

CONCLUSION

32. In conclusion, BA needs to comprehensively revamp its collocation processes and procedures and adequately resource and train the staff that handle and do collocations.



John Fogarty
Collocation Program Manager
Covad Communications Company
September 24, 1998

**COVAD'S NY CAGE PROBLEMS
(NOT ALL INCLUSIVE)
ATTACHMENT A**

Cage A:

- One duplex outlet not provided
- Fuse locations not stenciled
- Cable holes installed flange up (upside down)
- Door key not provided
- No Covad sign
- Cage box not stenciled
- Common door wall to be moved
- 2 110v 20a essential feeds not provided
- Cable not long enough to reach fuse Covad panel
- Fuse numbers not stenciled
- POT bay cable rack to be redesigned
- HICAP bay cable counts not stenciled
- ABAM not grounded in bay
- Too much slack loop cabling
- Cabling not streaked
- Fuse numbers not stenciled
- Window by radiator not sealed
- Wide open cable holes over common area
- Add power rack to cable hole
- Add switchboard rack to cable hole

Cage B:

- Building lighting switch not available
- 2 110v 20a essential feeds not provided
- One duplex outlet not provided
- 20A breakers not tagged Covad
- CILLI not stenciled
- No Covad sign
- Fuses not stenciled
- Cable counts and numbers not stenciled
- DS3 panel moved up
- Dusty – construction
- Garbage in hall
- Remove temporary AC construction lights
- AC controls and alarms
- Rework ground bar

Cage C:

- Cage door lock needs new cylinder
- No Covad sign

No stenciling on essential feeds
Run power leads

Cage D:

Power bay provided but no cabling into cage
Cage upgrade needed
No cage lock or key
One duplex outlets not provided
Outlet needs to be moved
Ground cable improperly crimped
POT bay needs to be reground in direction of flow
No emergency lighting

Cage E:

One duplex outlet not provided
Cable holes installed flange up (upside down)
CILLI not stenciled in POT bay
No air-conditioning
Cage door had to be moved because POT bay in front of cage door
HICAPs put in backwards

Cage F:

POT bay moved because blocking cage door
One duplex outlet not provided
20A breakers not tagged Covad
Fuse locations not stenciled on outlet
Cable holes placed flange up (upside down)
No Covad sign
Cabling into SVGALS in wrong opening
New racking needed for POT bay line-up and Covad
Close cable holes over cage

Cage G:

Duplex outlets not stenciled with breaker number
One duplex outlet not provided
CILLI not stenciled
Cable holes placed flange up (upside down)
Cage door key not provided
Additional fuses needed
No ABAM shield ground
Cable number not stenciled in SVGALS bay

Cage H:

2110v 20a essential feeds not provided
One duplex outlet not provided
PDSC to be moved to outside of cage

SVGALS rack to be dropped
Add waterfall rack to cable holes switchboard
Power and switchboard on combined rack

Cage I:
One duplex outlet not provided
20A breakers not tagged Covad
Cage top caved in
Cable holes placed flange up (upside down)
No Covad sign
Reroute and add VG cable rack

Cage J:
No emergency lighting
One duplex outlet not provided
PDSC inside cage and not stenciled
CILLI not stenciled
No Covad sign
POT bay racking needs to be redone
Cable counts and numbers not stenciled
No POT bay shield ground

Cage K:
No key to common area entrance
No emergency lighting
One duplex outlet not provided
20A breakers not tagged Covad
2 110v 20a essential feeds not provided
Cable holes not installed flange up (upside down)
No Covad sign
HICAP bay cable counts not stenciled
SVGALS bay cable numbers and counts not stenciled
Remove radiator
Need protection on water pipes
Area needs to be cleaned up
Ironwork wrong

Cage L:
AC power in transition
One duplex outlet not provided
Lighting pickup to be moved
Location of cable holes wrong
No Covad sign
No single point of ground
No stenciling on cable numbers and counts

Cage M:

- One duplex outlet not provided
- PDSC not in common area and AC shut off not mounted on outside of cage
- Cable not long enough to reach fuse Covad panel
- Ground bar not within 100 feet of ground
- Cable hole to be sealed

Cage N:

- No lock on common area door
- 2 110v 20a essential feeds not provided
- One duplex outlet not provided
- Cable not long enough to reach fuse panel
- No Covad sign
- No cable holes cut
- PDSC breakers not tagged Covad
- No separate ABAM ground
- No emergency access

Cage O:

- One duplex outlet not provided
- Additional racking for POT bay
- No fiber rack
- No key in common area lock
- No cable stenciling
- Cables not butted or supported
- Ground bar not within 100 feet of Ground

Cage P:

- No cylinder in door lock
- No Covad sign
- Cut cable rack back out
- 2 BDFB fuses on a common BUS panel
- Cable numbers and counts not stenciled
- No single point of ground
- No keys to cage

Cage Q:

- CILLI not stenciled
- No Covad sign
- Relocate DS3 to top of Bay
- DS1 needs to be wired
- Racking incorrect
- No air-conditioning
- New floor asbestos removal
- Relocate ground tap on SVGALS
- Close cable hold over cage

Cage R:

- No lock on entrance door
- One duplex outlet not provided
- Add racking to cable holes
- Water fall cabling inside cage
- Reground POT bay
- Asbestos removal-floor replacement

Cage S:

- One duplex outlet not provided
- 20A breakers not tagged Covad
- Fuse locations not stenciled on shutoff
- No Covad sign
- PDSC AC shut off not mounted on outside of cage
- Cable needs to be rebutted
- Water pipes by cage
- Move cage walls
- Cable holes need to be cut

Cage T:

- Building light switch not available
- Emergency lighting
- One duplex outlet not provided
- 20A breakers not tagged Covad
- Fuse locations not stenciled
- Cable holes not installed flange up (upside down)
- HICAP bay cable counts not stenciled

Cage U:

- 2 110v 20a essential feeds not provided
- One duplex outlet not provided
- 20A breakers not tagged Covad
- Fuse locations not stenciled
- No Covad sign
- Cable holes not cut
- Add racking
- Cable counts not stenciled
- Windows not sealed
- AC not on
- AC controls and alarms
- No asbestos in floor

Cage V:

- One duplex outlet not provided
- 20A breakers not tagged Covad

Cable holes sag
Cable not long enough to reach fuse Covad panel
Cable counts not stenciled
Cable holes not closed properly

Cage W:

Remove AC shut off
One duplex outlet not provided
1 box to pick up lighting feed not provided
CILLI not stenciled
No Covad sign
Cable not long enough to reach fuse Covad panel
Cable counts not stenciled
Shield needs reground

Cage X:

One duplex outlet not provided
No access to light switch in common area
Move rack to CA hole
HICAP in backwards
Remove DS3 cable
Move ground wire in SVGALS bay
Remove bars in SVGALS bay
Remove choke on bond